

FAMILY INVESTMENT ADMINISTRATION

Policy Number:	25-11
Policy Title:	Medicare Advantage Supplemental Benefits Excluded from Income
Release Date:	February 20, 2025
Effective Date:	Immediately Upon Release.
Approved By:	Augustin Ntabaganyimana Executive Director Family Investment Administration
Revision Date(s):	Not applicable.
Supersedes:	Not applicable.
Originating Office:	Office of Programs Office of Nutrition Assistance Programs
Required Actions:	Not applicable.
Key Words:	Medicare Advantage, Supplemental Benefits, Excluded Income
Related Federal Law	7 U.S.C. § 2011-2036a , 7 CFR § 273.9
Related State Laws	Not applicable.
COMAR	COMAR 07.03.17.30
State Plan Implications?	No.



Maryland
 Department of
 Human Services
 Department of Human Services
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**FAMILY INVESTMENT
 ADMINISTRATION (FIA)
 INFORMATION MEMO**

Control Number: # 25- 11

Effective Date: Upon Receipt

Issuance Date: February 20, 2025

**TO: LOCAL DEPARTMENTS OF SOCIAL SERVICES (LDSS)
 DIRECTORS, LDSS DEPUTY/ASSISTANT DIRECTORS FOR
 FAMILY INVESTMENT, FAMILY INVESTMENT SUPERVISORS AND
 ELIGIBILITY STAFF**

FROM: AUGUSTIN NTABAGANYIMANA, EXECUTIVE DIRECTOR

**RE: MEDICARE ADVANTAGE SUPPLEMENTAL BENEFITS
 EXCLUDED FROM INCOME**

**PROGRAM AFFECTED: SUPPLEMENTAL NUTRITION ASSISTANCE
 PROGRAM (SNAP)**

ORIGINATING OFFICE: OFFICE OF PROGRAMS

Summary

The purpose of this Information Memo is to provide clarification on the exclusion of Medicare Advantage supplemental benefits from income when determining SNAP eligibility.

Policy

Medicare Part C is known as Medicare Advantage, which is Medicare through private insurance. Medicare Advantage supplemental benefits are reimbursements paid to the Medicare Part C enrollee for items and services that are for the health of the Medicare enrollee and not available under Medicare Parts A, B, or D. The Centers for Medicare and Medicaid Services (CMS) approve these items and services based upon Medicare guidelines defining “primarily health related” or “Special Supplemental Benefits for the Chronically Ill (SSBCI).” The benefits are administered through spending cards (commonly known as “Flex Cards”) that are limited to certain covered items or services that vary by insurer, such as food, transportation, or utilities. Flex cards look like regular debit cards, but the design that appears on them varies by insurance company. They are labeled, usually with language such as “Medicare Flex Card” or “Advantage MD.”

Income

[Section 5\(d\)\(5\) of the Food and Nutrition Act of 2008](#) excludes reimbursements for past or future expenses from income as long as they are not more than the actual expense amount and do not represent a gain or benefit to the household. Since the Medicare Advantage supplemental benefits are only approved by CMS based upon meeting the established guidelines, all Medicare Advantage supplemental benefits are excluded when determining income for SNAP purposes.

Excess Medical Deduction

Reimbursements from Medicare Advantage supplemental benefits are excluded and not considered income. Therefore expenses for which the household was reimbursed are not allowable expenses for the Excess Medical Deduction, and must not be entered on the Medical Expenses screen in the Eligibility & Enrollment (E&E) system.

Implementation

Verification

As excluded income, Medicare Advantage supplemental benefits are not required to be verified unless it is questionable. State On-Line Query Internet (SOIQi) does not specifically capture Medicare Part C details. However, the Title II Entitlement tab of a SOIQi response contains a section titled "Other Amount." If the customer pays a premium for a supplemental insurance benefit, it will be reflected in the "Premium Insurance Amount" field in this section. This information only flags an individual as possibly being enrolled in a Medicare Advantage plan and does not serve as verification of the amount that the individual receives on their flex card or how the funds are spent. Therefore, any verification must be requested via a 1052 Request for Information.

Reminder

Verification of medical expenses is not required to receive SNAP benefits. If a medical expense is questionable and verification is requested but not received, the case must be processed without the deduction.

Narration

If an individual reports that they are enrolled in Medicare Advantage and have a flex card as part of their plan, narration must state that. Additionally, if information regarding their participation in Medicare Advantage is questionable, narration must state what specifically is questionable and why, along with how it is addressed.

Inquiries

Please direct policy questions to FIA Policy by completing the [FIA Policy Information Request Form](#). Montgomery County staff may submit their policy questions via email at fia.policy@maryland.gov.

cc: DHS Executive Staff
FIA Management Staff
Constituent Services
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Office of Administrative Hearings